

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 24-20110-CR-GAYLES/GOODMAN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JERREN KEITH HOWARD,
CLEMENTA JOHNSON, and
DIORI BARNARD,

Defendants.

/

**DEFENDANTS' UNOPPOSED JOINT MOTION TO CONTINUE
JULY CALENDAR CALL AND TRIAL DATE**

Defendants, JERREN KEITH HOWARD, CLEMENTA JOHNSON, and DIORI BARNARD, by and through their respective undersigned counsel, move this court for entry of an order postponing the calendar call and trial date in this cause currently scheduled for July 9, 2025, and July 14, 2025, respectively, for an additional 90 days. In support thereof Defendants state as follows:

1. This matter is currently scheduled for calendar call on July 9, 2025, with a trial date of July 14, 2025. D.E. 106.

2. Although the parties attended a status conference on June 12, 2025, confirming the status of the trial date, various matters have transpired since that date necessitating a continuance. D.E. 122.

3. Defendant Diori BARNARD has recently undergone serious medical complications requiring surgical intervention while in custody of the Bureau of Prisons [BOP]’s Federal Detention Center in Miami [FDC Miami]. Although a particular date for the surgical procedure cannot be confirmed in advance, it is expected that BARNARD will go undergo surgery within the next 10-14 days. He is being informed that this procedure will require a 4-week recovery period.

4. Defendant Clemente JOHNSON, recently present at a change of plea conference on June 23, 2024, elected to proceed to trial instead, further requesting that his CJA counsel be withdrawn. D.E. 131. New counsel was assigned as recently as June 24, 2024. D.E. 132.

5. Defendant JOHNSON’s counsel now seeks a continuance as he is in the process of receiving, reviewing, and analyzing thousands of pages of discovery, including hours of audio and/or video footage.

6. Defendant Jerren HOWARD’s counsel has been in the process of determining whether he intends to plea, but given the circumstances also joins in this continuance.

7. Counsel for defendants have conferred with Counsel for the Government, who has no objection to a continuance for the reasons state herein.

8. Counsel for the Government, AUSA A. Waxman, notes that she will be in a three-week trial beginning August 25, before the Honorable Judge Roy Altman.

9. Therefore, in consideration of Defendant BARNARD's medical issues in the next 45 days, the time reasonably necessary for Defendant JOHNSON's new counsel to prepare the instant matter for a 3 week trial, and the Government's trial schedule in August/September 2025, Defendants' respectfully request a continuance for an additional 90 days.

10. This motion is filed in absolute good faith and not made for solely dilatory purposes.

WHEREFORE, Defendants pray for the entry of an order continuing the calendar call and trial date for an additional 90 days.

Respectfully submitted,

/s/ *Danise Ponton*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was on this 2nd day of July 2025, furnished to all interested parties via the CM/ECF filing system.

Respectfully submitted,

BY: /s/ *Danise Ponton*

DANISE PONTON, ESQ.
ATTORNEY FOR DIORI BANARD